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Attorneys for Plaintiff  
COPART INC.

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

COPART INC.,  
Plaintiff,

vs.

CRUM & FORSTER INDEMNITY  
COMPANY, UNITED STATES FIRE  
INSURANCE COMPANY, and DOES 1-10,  
Inclusive,  
Defendants.

AND RELATED CROSS-ACTION

Case No. C 07 2684 CW-EDL

**E-FILING**

**DECLARATION OF ERIC K. LARSON  
IN SUPPORT OF PLAINTIFF  
COPART, INC.'S OPPOSITION TO  
MOTION TO COMPEL**

Date: January 15, 2008

Time: 2:00 p.m.

Place: Courtroom E

Hon. Elizabeth D. Laporte

Action Filed: March 20, 2007

Trial Date: TBA

I, Eric K. Larson, declare as follows:

1. I am an attorney at law duly admitted to practice before this court and am an associate at Pillsbury & Levinson, LLP, attorneys of record herein for plaintiff Copart, Inc. I have personal knowledge of the facts set forth herein and could competently testify thereto.

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2. On October 17, 2007, I had a conversation with Samuel Ruby, counsel for USFIC to discuss Copart document requests and production. After following up with Copart on the existence of certain documents discussed in that call, I sent a letter to Mr. Ruby, dated November 15, 2007, that confirmed the substance of our conversation and discussed the existence, or lack thereof, of documents related to property replacement values. A true and correct copy of my November 15, 2007 letter is attached hereto as **Exhibit A**.

3. I never received any correspondence or phone call from USFIC's counsel disputing the contents of my November 15, 2007 letter or asking for further clarification. Instead, Copart was served with the present motion to compel, which did not include that letter.

4. On November 30, 2007, I sent a letter to Mr. Ruby, a true and correct copy of which is attached hereto as **Exhibit B**.

5. Attached hereto as **Exhibit C** is a true and correct copy of a December 5, 2007 letter I received from Judith Whitehouse of the Bullivant firm.

6. Attached hereto as **Exhibit D** is a true and correct copy of my letter of December 19, 2007 and the enclosed amended responses. The letter also enclosed a revised privilege log and additional documents.

7. Attached hereto as **Exhibit E** is a true and correct copy of an email I sent to Ms. Whitehouse and Mr. Ruby on December 20, 2007.

8. Attached hereto as **Exhibit F** is a true and correct copy of a December 20, 2007 letter I received from Ms. Whitehouse.

9. Copart has produced nearly 1,800 pages of documents, including extensive emails, to USFIC. In addition, pursuant to subpoena, and without objection from Copart,

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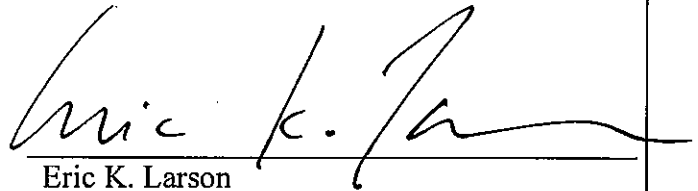
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1 Marsh has produced nearly 3,500 pages of documents related to Copart's property policies  
2 with USFIC.

3 I declare under penalty of perjury under the laws of the State of California that the  
4 foregoing is true and correct, and that this Declaration was executed on December 21, 2007 in  
5 San Francisco, California.

6  
7 Dated: December 21, 2007

8   
Eric K. Larson

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